## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

SAMUEL KERSON,	)	
Plaintiff,	)	
	)	
v.	)	No. 2:20-cv-00202-gwc
	)	_
VERMONT LAW SCHOOL, INC.,	)	
Defendant.	)	
	)	
	)	

## DECLARATION OF JEFFREY KNUDSEN

I, Jeffrey Knudsen, do hereby state and declare:

- 1. I am the Buildings and Grounds Supervisor at Vermont Law School. I have personal knowledge of the facts and information contained in this Declaration.
- 2. As detailed in my prior Declarations in this matter, Vermont Law School intends to install a cover over the mural on the upper level of Chase Hall in a manner that does not make contact with the mural and leaves approximately two inches between the mural and the acoustic panels. I previously submitted construction drawings and a cut sheet illustrating the plan for constructing the cover and the type of acoustic panel we will use. See Exhibit A to February 1, 2021 Declaration (Doc. 11-7) and Exhibit C to February 12, 2021 Declaration (Doc. 13-2).
- 3. In my view, the cover presents less risk of harm to the mural than the status quo. The cover should protect the mural from any degradation that might be caused by exposure to light over time, and it will deter access by anyone who might wish to injure or deface the work.
  - 4. To monitor environmental conditions, we intend to install digital

humidity and temperature monitors both behind the cover structure and in the room itself. This will allow Vermont School to keep track of humidity and temperature near the mural surface and ensure that there is no significant deviation from ambient conditions in the upper level of Chase Hall.

I declare under the pains and penalties of perjury that these statements are true and correct.

Dated at South Royalton, Vermont this Zaday of March 2021.

Jeffrey Knudsen